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October 2, 2020

Via ECF

Hon. Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
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Re: *Uniformed Fire Officers Association et al v. DeBlasio et al* 1:20-cv-05441-KP

Dear Judge Failla:

Pursuant to Your Honor's individual rules, Intervenor Communities United for Police Reform ("CPR") requests a pre-motion conference regarding its anticipated Motion to Dismiss the First Amended Complaint under Fed. R. Civ. P. 12(b)(6).

CPR has stated in prior briefing many of the grounds on which this case should be dismissed. In response to the Motions to Dismiss filed by CPR and the City (ECF Nos. 220 and 223), Plaintiffs filed an Amended Complaint (ECF No. 226) attempting to cure pleading deficiencies and re-frame certain claims. So that it may specifically address the deficiencies of Plaintiffs' claims and allegations as now pled, CPR now intends to move to dismiss the First Amended Complaint.

CPR has conferred with counsel for Plaintiffs and for the City Defendants on a briefing schedule. All Parties consent to the motion and the proposed schedule briefing schedule below:

October 16	City Defendants' and CPR's Motions to Dismiss the FAC
November 6, 2020	Plaintiffs' Opposition to Motions to Dismiss
November 20, 2020	Replies in Support of Motions to Dismiss

CPR respectfully requests that the Court issue an Order setting the briefing schedule agreed to by the Parties.



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Respectfully submitted,

/s/ Alex V. Chachkes
Alex V. Chachkes

/s/ Margaret L. Wheeler-Frothingham
Margaret L. Wheeler-Frothingham

cc (via ECF):
All counsel of record